

October 31, 2017

Air Enf. & Comp. Assistance – NSPS
Air Protection Division
US EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Email: AEO_R9@epa.gov

RE: Seneca Resources Corporation – West Operations
Initial Compliance Report – 40 CFR 60 Subpart OOOOa
OOOOa Reporting Period: August 2, 2016 – August 2, 2017

To Whom It May Concern:

On behalf of Seneca Resources Corporation (Seneca), Trinity Consultants Inc. (Trinity) hereby submits the initial annual compliance report for affected facilities subject to New Source Performance Standards (NSPS) 40 CFR 60 Subpart OOOOa. Future compliance reports for Seneca's affected facilities under Subpart OOOOa will be by October 31st of each year, and will cover the prior year's reporting period (August 2 – August 2).

The NSPS OOOOa affected facilities contained within this report include those that commenced construction¹ between September 18, 2015 and August 2, 2017². Per §60.5410a, the initial compliance period for NSPS OOOOa affected facilities begins on August 2, 2016, or upon initial startup, whichever is later, and ends no later than 1 year after the initial startup date or no later than 1 year after August 2, 2016 (note that the initial compliance period may be less than one full year). Per §60.5420a(b), the initial annual report under NSPS OOOOa is due no later than 90 days after the end of the initial compliance period. Thus the earliest due date for an initial report under NSPS OOOOa is October 31, 2017.

With regard to fugitives monitoring, no monitoring surveys were waived under §60.5397a(g)(5). Seneca does not operate any centrifugal or reciprocating compressor affected facilities, pneumatic controller affected facilities³, storage vessel affected facilities⁴, processing unit affected facilities, or sweetening unit affected facilities as defined in NSPS OOOOa.

Should you have any questions, please contact Timothy Alburger at (661) 399-4270 or by email at alburgert@srcx.com.

Sincerely,



Tony Phan
Managing Consultant - Trinity Consultants Inc.

Attachments

¹ For the purposes of wells, 'commenced construction' corresponds to start of flowback (i.e. well completion).

² Seneca does not have any NSPS OOOOa reciprocating compressor affected facilities as of the end of the subject compliance period.

³ Seneca does operate pneumatic controllers constructed after September 18, 2015, but they are either intermittent or low-bleed devices (or powered by air). As such, they are not pneumatic controller affected facilities under the rule.

⁴ Seneca does operate storage vessels constructed after September 18, 2015, but VOC emissions from these vessels are less than 6.0 tpy. As such, they are not storage vessel affected facilities under the rule.

NSPS 0000a Initial Report

Pursuant to 40 CFR §60.5420a(b)

Company Information

§60.5420a(b)(1)

Company Name: Seneca Resources Corporation

Company Mailing Address:	4800 Corporate Court	Bakersfield	CA	93311
	Street Address	City	State	Zip Code

For information regarding this report please contact the following:

Contact Name: Timothy R. Alburger
Contact Phone Number: (661) 399-4270
Contact Email Address: alburger@seneca.com

Reporting Period

Compliance Period Start Date:	August 2, 2016
Compliance Period End Date:	August 2, 2017
Date Report Submitted by:	October 31, 2017

Certification By a Certifying Official

Statement of Certification: Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

Name of Certifying Official: Timothy R. Alburger

Title of Certifying Official: Senior Advisor, EHSQ

Email Address: alburger@seneca.com

Phone Number: (661) 399-4270

Signature: 

Signature Date: 10.31.17

ATTACHMENT 1 - LIST OF AFFECTED FACILITIES

The asterisk (*) next to each field indicates that the corresponding field is required.

FACILITY INFORMATION										ADDITIONAL INFORMATION		
Facility Record No. * (Field value will automatically generate.)	Facility Name *	Address of Processing Plant *	Address 2	City *	County *	State Abbreviation *	Zip Code *	Responsible Agency Facility ID (State Facility Identifier)	Beginning Date of Reporting Period *	Ending Date of Reporting Period *	Please enter any additional information	Enter associated file name reference.
e.g.: ABC Company		e.g.: 123 Main Street	e.g.: Suite 100	e.g.: Rossmore	e.g.: Kings County	e.g.: NY	e.g.: 11221		e.g.: 01/01/2016	e.g.: 06/30/2016		e.g.: filename.zip
1 Midway-Sunset 15A	(b) (9)			(b) (9)	Kern County	CA	93311 51114		08/02/2016	08/02/2017		
2 Midway-Sunset Maricopa					Kern County	CA	93311 53755		08/02/2016	08/02/2017		
3 BNVSS Hoyt					Kern County	CA	93311 54158		08/02/2016	08/02/2017		

ATTACHMENT 2 - INITIAL REPORT

EQUIPMENT INFORMATION

Facility Record No. * (Select from dropdown list)	Process unit Identification * (\$60.487a(b)(1))	Number of pressure relief devices * (\$60.5422a(b))	Number of valves, excluding those valves designated for no detectable emissions * (\$60.487a(b)(2))	Number of pumps, excluding those pumps designated for no detectable emissions and those pumps complying with §60.482- 2a(f) * (\$60.487a(b)(3))	Number of connectors * (\$60.487a(b)(5), \$60.5422a(a))
	e.g.: HVDry-1a	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5
1 15A		14	0	1	434
2 Maricopa		12	0	1	372
3 Hoyt		7	0	1	217

EQUIPMENT INFORMATION

Facility Record No. * (Select from dropdown list)	Month Identification* (Select from dropdown list)	Number of pressure relief devices for which leaks were detected * (\$60.5422a(c)(1))	Number of pressure relief devices for which leaks were not repaired * (\$60.5422a(c)(2))	Number of valves for which leaks were detected * (\$60.487a(c)(2)(i))	Number of valves for which leaks were not repaired * (\$60.487a(c)(2)(ii))	Number of pumps for which leaks were detected * (\$60.487a(c)(2)(iii))	Number of pumps for which leaks were not repaired * (\$60.487a(c)(2)(iv))	Number of connectors for which leaks were detected * (\$60.487a(c)(2)(vii), \$60.5422a(a))	Number of connectors for which leaks were not repaired * (\$60.487a(c)(2)(viii), \$60.5422a(a))
		e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5
1	June	0	0	0	0	0	0	4	0
2	June	0	0	0	0	0	0	0	0
3	June	0	0	0	0	0	0	0	0

ATTACHMENT 3 - LEAK SURVEY SUMMARY

Seneca Resources
Tank Component Leak Summary

PTO	QTR	Field	Lease/Facility	Area	Component	Leak Rate	Detection		
					Type		Date	Repair Date	Retest Date
S1114	2	Midway-Sunset	15A	T-4	Tank Chime	2,475	06/22/17	06/22/17	06/22/17
S1114	2	Midway-Sunset	15A	Wemco	Hatch	6,500	06/29/17	06/29/17	06/29/17
S1114	2	Midway-Sunset	15A	Wemco	Hatch	4,600	06/29/17	06/29/17	06/29/17
S1114	2	Midway-Sunset	15A	Wemco	Hatch	9,900	06/29/17	06/29/17	06/29/17

ATTACHMENT 4 - TVA 1000 CALIBRATION LOG

TVA 1000 CALIBRATION LOG

Date	Gas (ppm)	Adjustment	Comment
5-23-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	θ
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 1,030
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,675
5-24-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	θ
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 1,020
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,400
5-25-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	θ
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 1,000
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,600
5-26-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	θ
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 1,045
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,130
6-6-16	Zero (air)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	10
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 500
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 5,000
6-7-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	θ
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 1,001
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,700
6-8-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	θ
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 1,000
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 10,000
6-9-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	θ
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 930
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,300
6-10-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	θ
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 950
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,500
6-13-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	θ
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 1,000
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 10,000

TVA 1000 CALIBRATION LOG

P-3

Date	Gas (ppm)	Adjustment	Comment
6/17/16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 840
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 10,500
6/20/16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 995
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 8,895
6/21/16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 990
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 8,900
6/22/16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 870
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,200
6-23-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 1,050
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 10,400
6-24-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 1,150
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 10,000
6-27-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 980
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,900
7-5-16	Zero (air)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	6.0
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 835
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 7,665
7-6-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 950
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,700
7-7-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 824
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 1,100

TVA 1000 CALIBRATION LOG

(b) (6)

Date	Gas (ppm)	Adjustment	Comment
6-9-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	<i>2</i>
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>1,010</i>
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>10,000</i>
6-10-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	<i>2</i>
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>975</i>
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>9800</i>
6-13-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	<i>2</i>
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: <i>990</i>
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: <i>10,000</i>
6-14-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	<i>2</i>
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>970</i>
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>9,800</i>
6-15-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	<i>2</i>
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: <i>880</i>
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: <i>8,900</i>
6-16-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	<i>2</i>
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>1,050</i>
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>10,600</i>
6-17-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	<i>2</i>
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>1,075</i>
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: <i>11,100</i>
6-20-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	<i>2</i>
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>990</i>
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>10,100</i>
6-21-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	<i>2</i>
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>990</i>
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>10,000</i>
6-22-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	<i>2</i>
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: <i>800</i>
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: <i>9,000</i>

TVA 1000 CALIBRATION LOG

(b) (6)

Date	Gas (ppm)	Adjustment	Comment
6-23-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 800
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 8,200
6-24-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 980
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 8,800
6-27-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 985
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 10,000
6-28-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 990
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,960
6-29-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 985
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 1,400
6-30-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 475
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,950
7-1-16	Zero (air)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	57
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 1,200
	10,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 12,100
7-5-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 990
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 10,000
7-6-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 830
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 9,920
7-7-16	Zero (air)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	0
	1,000.0	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Not required	Found: 814
	10,000.0	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not required	Found: 1,000